

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA  
NORTHERN DIVISION**

FIRST HORIZON BANK,	)	
	)	
Plaintiff, and	)	
	)	
RENASANT BANK,	)	
	)	Case No.: 2:24-cv-00605-RAH
Plaintiff-Intervenor,	)	
	)	
v.	)	
	)	
PREMIER HOLDINGS, LLC, <i>et</i>	)	
<i>al.</i> ,	)	
	)	
Defendants.	)	

**SUBMISSION OF PROPOSED RECEIVER**

On November 20, 2024, the Court entered its Order [Doc. 64] (the “Order”) directing the parties to “provide the names of any individuals or entities that the Court should consider for a receiver.” Renasant Bank (“Renasant”) continues to maintain that at most, a receiver should be appointed over only the two real properties in which Plaintiff First Horizon Bank holds a mortgage interest and reserves all rights thereto. To the extent a receiver is appointed in any capacity, Renasant submits the name of the Montgomery, Alabama-based firm Moore Company Realty (“Moore Company”) and in particular Darrell R. Ragan (Distress Asset & Land Sales Specialist) and Eric Higgins (Certified Commercial Investment

Member). Additional information regarding Moore Company, Mr. Ragan and Mr. Higgins is attached as **Exhibit A**. Moore Company is a customer of Renasant.

Dated: November 26, 2024.

/s/Gabriel J. Quistorff

One of the attorneys for Renasant Bank

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**CERTIFICATE OF SERVICE**

I hereby certify that on this 26<sup>th</sup> day of November, 2024, a true and correct copy of the above and foregoing was filed via the CM/ECF System, and that a copy of the foregoing has been served upon the following by placing a copy of same in the United States Mail, properly addressed and postage prepaid, on this the 18th day of November, 2024.

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Laetsch Properties, LLC*

/s/ Gabriel J. Quistorff  
Of Counsel

# Exhibit A





# COMMERCIAL REAL ESTATE SOLUTIONS

MOORE COMPANY REALTY, INC | MOORE PROPERTY MANAGEMENT, LLC



# OUR SERVICES

- SALES
- LEASING
- SALE-LEASEBACK
- CONSULTING
- INVESTMENTS
- PROPERTY MANAGEMENT
- ASSET MANAGEMENT
- BUILD TO SUIT
- TENANT REPRESENTATION
- URBAN REVITALIZATION
- DEVELOPMENT SERVICES
- CONSTRUCTION SERVICES
- BROKER OPINION OF VALUE (BOV/BPO)
- REAL ESTATE RECEIVERSHIPS
- SPECIAL ASSETS/ REO
- DISTRESSED PROPERTIES
- SHORT-SALES/ WORKOUTS
- NOTE SALES
- EXPERT WITNESS
- TURNAROUND/ RESTRUCTURING CONSULTING

Founded in 1894, Moore Company Realty is a fourth-generation business with deep roots in Alabama. If you're in search of commercial real estate services in the Southeast, Moore Company Realty is your top choice. Our seasoned team led by CCIMs, SIORs and CPMs, has over \$2 Billion of transactional experience. With more than 200 years in combined knowledge of the local markets we can assist you in finding the ideal commercial property for sale or lease. We also provide comprehensive commercial property management services to ensure your investment is well-maintained. Our expertise and commitment to client satisfaction has enabled us to succeed in business for over 130 years.





# OUR OPERATIONS & ASSET CLASSES

OFFICE  
INDUSTRIAL  
DATA CENTER  
HOTELS & HOSPITALITY  
SPECIAL PURPOSE/ SOLAR FARM



MULTIFAMILY  
RETAIL  
SELF STORAGE  
MIXED USE  
LAND

Partnering with Moore Company Realty and Moore Property Management provides you with the benefit of a full-service brokerage and property management team, allowing you to concentrate on your business while we handle all your real estate needs.

**MARKETING** with our agents' expertise in presentation will significantly reduce your time on the market. We have the tools necessary to showcase listings clearly and effectively, reaching the largest number of qualified prospects in the shortest amount of time. Our goal is to maximize exposure for each property, which ultimately translates into the highest value for our clients.

**ACQUISITIONS** acquiring a property demands due diligence and a thorough analytical review of revenue, market conditions, expenses, potential savings, asset longevity, and identifying value enhancements. It requires an experienced team of professionals to fully grasp these principles.

**DISPOSITIONS** selling a project is similar to purchasing; having an experienced team of professionals is crucial for evaluating, positioning and achieving the highest possible asset value.

**MANAGEMENT** Experience, Credentials, Security. We are an Accredited Management Organization (AMO®), led by Certified Property Managers (CPMs). Our CFO is a Certified Managerial Accountant (CMA) with an MBA. Leverage our company's wealth of over 200 years of combined experience to help you avoid the pitfalls that owners may encounter and capitalize on the opportunities provided by our reliable management team.

**TENANT NEGOTIATIONS** in particular, can be lengthy and complex. Mistakes are not an option. The success or failure of a business often hinges on securing the right location and terms. We use our market knowledge, along with industry and internal tools, to manage the process and help you make the best decision for your company the first time!



## MONTHLY REPORTING

With a team that includes CPMs, CCIMs, SIORs, CREs, MBAs, CPAs and CMAs supporting our brokerage division, we have the expertise and resources to manage even the most complex reporting requirements.



## STRONG RELATIONSHIPS

Our company is founded on the values of responsibility, fairness, and respect. Understanding the importance of making a positive first impression, each of our agents are trained to be approachable, helpful, and readily accessible. We assign a dedicated team to each property, ensuring that our clients and tenants always know who to contact when needed.



## FEASIBILITY STUDIES

Considering a commercial property purchase? Let us conduct an upfront analysis to ensure your success throughout the life of the investment. Sustainability is crucial in property ownership. We'll help you identify opportunities and avoid potential pitfalls before you commit to the investment.



# OUR RECEIVERSHIP & SPECIAL ASSET SERVICES

We provide local turnkey solutions. When supported by a full-service commercial real estate platform, Receivers are best positioned to provide a highly professional and seamless experience. Integrating leasing, management, capital markets, and operational support under one umbrella removes barriers, fosters close collaboration, ensures clear communication, and accelerates decision making.

Our primary objective is to efficiently operate and manage the property on behalf of the Receivership Estate while enforcing all rights under the loan documents. Our team has exclusively represented Receivers, Lenders/Banks, and the FDIC on more than 200 special assets/REO and Receivership engagements.

## *Our Real Estate Receivership Services Include:*

**RENTS, ISSUES & PROFITS RECEIVER AND CONSTRUCTION COMPLETION RECEIVER:** We will work as a court appointed Receiver, or as a designated fiduciary of a Receiver.

**IMMEDIATE CONTROL & POSSESSION:** We will take immediate control and possession of the property and all associated assets.

**ASSET & INCOME PROTECTION:** We will secure original records, leases, and accounts to safeguard the asset and its income stream.

**COMPREHENSIVE ACCOUNTING:** We will conduct a thorough accounting of all records from both prior to and after our engagement by Receiver, and establish new operational procedures as necessary.

**FINANCIAL & PROPERTY MANAGMENT:** We will open new accounts, collect and receive all rents and income due, and assume, enforce, employ, or terminate contracts as required for the effective operation of the property.

**PROPERTY INSPECTION & STAKEHOLDER ENGAGEMENT:** We will conduct a complete inspection of the property and establish communication with tenants and vendors.

**MAINTENANCE & ACCOUNTING PROCEDURES:** We will provide detailed accounting procedures and system reports to the court.

**DISPOSITIONS & PROPERTY MARKETING:** We will strategically position and market the property for sale or lease to maximize its value.



# OUR PORTFOLIO



Moore Company Realty and Moore Property Management have offices in Montgomery, Birmingham, and Daphne, Alabama. We have a proven track record of successfully managing over 100 properties, valued in excess of \$200 million and encompassing more than 3 million square feet of commercial space in Alabama and Georgia. Our agents are licensed in Alabama, Georgia, Florida, Tennessee, Mississippi, and Louisiana. With our expertise, we ensure that our clients' properties are maintained to the highest standards and generate maximum returns.



# OUR TEAM

## SALES, DEVELOPMENT & INVESTMENTS

JEROME T. MOORE, III, CCIM  
Chief Executive Officer

GENE CODY, CCIM, SIOR  
President, MCRI

JON MASTERS, CCIM  
Vice President, MCRI

STEVE HUGHES, CCIM, CPM  
Chief Operating Officer

ERIC HIGGINS, CCIM  
Chief Operating Officer  
*Birmingham Office*

JONATHAN MCCALL, CCIM  
Tenant Rep. Broker

RICHARD PERRY PATINO  
Sales & Leasing Agent

SIMS HERRON  
Sales & Leasing Agent  
*Birmingham Office*

EMILY (MILLER) JONES  
Retail Broker  
*Daphne Office*

DARRELL RAGAN  
Distressed Asset & Land Sales Specialist  
*Birmingham Office*

JERRY MOORE  
Broker of Council

KATHI MCQUEEN  
Executive Brokers Assistant

JENNA BROOKS  
Marketing Coordinator

VALARIE DOMINGOS  
Receptionist

## PROPERTY MANAGEMENT

JEFF BRANCH, CPM  
President, MPM

ELIZABETH DEAN, CPM  
Vice President, MPM

LYNN BROWN  
Vice President, MPM

MATT EDWARDS, CPM  
Property Manager

LESLEY FOSTER  
Property Manager

HUGH LAWSON JOY  
Property Manager  
*Birmingham Office*

CLIFF MALONE  
Property Manager

PERI DEES  
Property Management Administrator

## ACCOUNTING

WILL TUCKER, MAC, CPA  
Chief Financial Officer

TONI WILKERSON  
Accounting Manager

AUDREY SERVOLD  
Property/Staff Accountant

LISA DOMINGOS  
Staff Accountant

JENI RESENDEZ  
Accounting Assistant

S. WAYNE LAMBERT  
Consultant

# OUR BRAND

The Moore Companies are a team of seasoned professionals with diverse backgrounds, specializing in operating, managing, organizing, marketing, and presenting your property to the commercial real estate market. Our goal is to generate deal volumes that allow us to offer accurate and competitive rates, ensuring the most profitable transactions for our clients. Beyond our core services, our agents leverage a variety of resources to enhance client profitability and assist them in making informed financial decisions.



**CCIM Institute**  
Commercial Real Estate's  
Global Standard for Professional Achievement



CoStar™



LoopNet™



**CREXi**  
Commercial Real Estate Exchange



Placer.ai



Ten-X



**SIOR®**

SOCIETY OF INDUSTRIAL  
AND OFFICE REALTORS®



**Smart**  
REAL ESTATE DATA



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MCR | MPM 7





**Darrell R. Ragan**  
Moore Company Realty, Inc.

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## BACKGROUND

Darrell has over 20 years of experience in the commercial real estate land brokerage business. He has closed over 160 land transactions totaling over \$150 million in sales. Darrell's extensive background in forest & wildlife resources over the last 30 years has made him an extremely valuable asset to have on our land team.

His expertise is in the following type of land assets and development projects: large recreational/timber investment tracts; master planned residential communities & single-family subdivision tracts; multi-family sites, shopping center sites; commercial outparcels; mixed-use, office, industrial, business park and build-to-suit sites. Darrell is a licensed real estate broker in Alabama and Georgia.

Darrell has represented multiple banks and the FDIC in the sale of bank owned land & lot assets across metropolitan Atlanta, Georgia and Birmingham, Alabama. He has had a significant role in the OREO disposition process and provided exclusive representation for several banks including: First Citizens Bank & Trust, SunTrust, State Bank & Trust, Synovus, Bank of North Georgia, Wells Fargo/Wachovia, Branch Banking & Trust/BB&T, Regions Bank, Bank of America, United Community Bank, PNC Bank/RBC Bank and the FDIC as well.

His tremendous success in selling all types of land assets across Alabama and Georgia submarkets provides us exposure to reach a far greater pool of potential buyers than other brokers. The ultimate benefit to the Seller is a focused marketing effort reaching local, regional, national, international developers & builders, pension funds, private equity groups, individual investors, opportunity funds, insurance companies, REIT's, and syndicators.

## PRIMARY SPECIALTIES

Land Brokerage	Business Development
Land Management	Asset Management
Land Development	Real Estate Receiverships
Site Selection	Distressed Properties
Zoning & Entitlement Processes	REO & Special Asset Dispositions

## DESIGNATIONS

Broker in Alabama & Georgia	Wetland Delineator
Wildlife Biologist	Prescribed Burn Manager
Environmentally Sensitive Area Consultant	Wilderness First Responder

## EDUCATION

University of Georgia, School of Forest Resources - B.S.F.R. in Wildlife Biology  
Abraham Baldwin Agricultural College - Wildlife Management

## SIGNIFICANT ASSIGNMENTS

A member of the 3-man land team that set the all-time Atlanta record for land transaction volume as recognized by the Atlanta Commercial Board of Realtors in 2008.







**Eric Higgins, CCIM**  
**Moore Company Realty, Inc.**

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## BACKGROUND

Eric has been in the commercial real estate business for more than 25 years. He has been involved in various disciplines in the commercial real estate industry involving development, land acquisitions/dispositions, office/industrial leasing, and investment sales. Eric has been involved in numerous transactions and development projects with an aggregate value in excess of \$925 million. Eric's methodical approach utilizes his industry experience to serve and create value for his clients.

## SKILLS

- Sale and Lease Commercial Real Estate
- Warehouse and Industrial Land Development
- Owner Occupied Properties
- Developed business lots from 1/2 acre to 100+ acres
- Property Management

## DESIGNATIONS

Broker in Alabama  
CCIM

## EDUCATION

The University of Alabama, BA in Communications

## PROFESSIONAL ACCOMPLISHMENTS

- Certified Commercial Investment Member (CCIM)
- Past Regional Vice President Region 9 CCIM Institute – Chicago
- Past President of the Alabama CCIM Chapter

## RECENT KEY TRANSACTIONS

- Greenbrier Preserve, Huntsville, AL- ±1,600 residential lots (Limestone County)
- First Solar, Inc., Trinity, AL- \$1 billion manufacturing facility (Lawrence County)
- Amazon, I & II, Huntsville, AL- 1 million square feet of distribution facilities (Limestone County)

